

DUANE MORRIS LLP

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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

WHITE HAWTHORNE, LLC,

Plaintiff,

v.

THE REPUBLIC OF ARGENTINA,

Defendant.

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NOTICE OF MOTION FOR SPECIFIC PERFORMANCE

PLEASE TAKE NOTICE that, pursuant to Rule 65(d) of the Federal Rules of Civil Procedure, and upon the accompanying Memorandum of Law in Support of Motion for Specific Performance dated September 14, 2015, and the incorporated Memorandum of Law in Support of the Motion by NML Capital, Ltd. for Specific Performance, *NML Capital, Ltd. v. Republic of Argentina*, 14-cv-8601 (TPG) (S.D.N.Y. August 14, 2015), ECF No. 26 and the Declaration of Robert A. Cohen in Support of Motion by NML Capital, Ltd. for Specific Performance, *NML Capital, Ltd. v. Republic of Argentina*, 14-cv-8601 (TPG) (S.D.N.Y. August 14, 2015), ECF No. 27, and all attached exhibits, Plaintiff White Hawthorne, LLC ("Plaintiff") will move before the Honorable Thomas P. Griesa, United States District Judge for the Southern District of New York, at the United States Courthouse, 500 Pearl Street, New York, New York, 10007, at a date

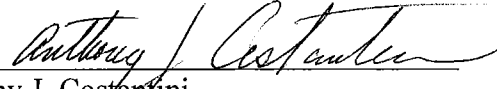
and time to be determined by the Court, for an Order granting specific performance of the second sentence of Section 1(c) of the 1994 Fiscal Agency Agreement (the "Equal Treatment Provision" of the "Pari Passu Clause"), and for such other relief as the Court deems just and proper.

NOTICE IS FURTHER GIVEN that Argentina's response to this Motion, if any, shall be served within fourteen (14) days after service hereof, on counsel for Plaintiff: Anthony J.

Costantini, Duane Morris LLP, 1540 Broadway, New York, NY 10036.

Dated: New York, New York
September 14, 2015

DUANE MORRIS LLP

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